

July 8, 1999

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Dockets Management Branch (HFA-305)
Food and drug Administration
5630 Fishers Lane, Room 1061
Rockville, Maryland 20852

Re: Docket #98N-1038, "Irradiation in the Production, Processing and Handling of Food"

To Whom It May Concern:

I write to support the continued labeling of irradiated foods with the current terminology, "treated with radiation" or "treated by irradiation," and the use of the radura symbol on all irradiated whole foods. In its initial petition, the FDA concluded that irradiation was a "material fact" about the processing of a food, and thus should be disclosed. The material fact remains; therefore, labeling should remain.

The label should be on the front of the package and large enough to be easy to read. For displayed whole foods such as produce, it is your absolute obligation to provide a prominent informational display similar to that used for meats. "Cold pasteurization" and "electronic pasteurization" are misleading and should not be used.

As you must know, irradiation diminishes the nutritional quality of food. It destroys vitamins A, C, and E, as well as microorganisms and antioxidants. In addition, processing by irradiation causes chemical changes that are not evident and are potentially hazardous. Irradiated meat may have a higher level of carcinogenic benzene. Many irradiated foods contain unique radiolytic products that have never been tested.

It is the FDA's responsibility to hold the corporations that are responsible for contaminating our foods accountable. The conditions in slaughter houses and meat packing plants jeopardize human health, all in the interests of increasing corporate profits. Rather than quibbling over the presence or absence, or size or content, of a label notifying the public that food is irradiated, the FDA should end the practice of food irradiation altogether. While irradiation label alerts the public, it does not protect the animals that are abused in slaughter houses, and it does not eliminate carcinogens. For the FDA to be complicit in this practice is unconscionable.

Sincerely,


Louise E. Travanti

cc: Barbara Boxer & Valerie Brown

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